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Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA**

DENALI NICOLE SMITH, on behalf of herself  
and others similarly situated,

Plaintiff,

vs.

MICHAEL DUNLEAVY, in his official  
capacity of Governor of the State of Alaska,  
Clyde "Ed" Sniffen, in his official capacity as  
Acting Attorney General of the State of Alaska,  
LUCINDA MAHONEY, in her official capacity  
as Commissioner of the State of Alaska,  
Department of Revenue, ANNE WESKE, in her  
official capacity as Director of the Permanent  
Fund Division, State of Alaska, Department of  
Revenue,

Defendants.

Case No. 3:19-cv-00298 HRH  
NON-OPPOSED MOTION TO EXTEND  
PRETRIAL DEADLINES

Plaintiff, Smith, by and through counsel, now submits this Motion to Extend  
Pretrial Deadlines, specifically the close of fact discovery, for 90 days from the currently

scheduled date of December 16, 2020 until March 16, 2021. Defendants' Counsel does not oppose this motion.

On October 13, 2020, undersigned counsel emailed Assistant Attorney General Rebecca Cain to request Defendant's non-opposition to an extension of pretrial deadlines based on the disruption of all litigation caused by Covid-19. On October 14, 2020, Ms. Cain replied that Defendants non-opposed an extension of any pretrial deadlines that had not already passed. Ms. Cain advised that a new attorney in her section would contact undersigned counsel.

On November 10, 2020, Defendants' counsel, Assistant Attorney General Rebecca Hattan, emailed undersigned counsel and communicated Defendants' non-opposition to an extension of pretrial deadlines for a period of 90 days. On November 17, 2020, upon Plaintiff's counsel's request, Defendants produced their initial disclosures to undersigned counsel.

Based on the nationwide disruption caused by Covid-19 and the fact that Plaintiff only received Defendants' Initial Disclosures on November 17, 2020, Plaintiff's counsel requests that the close of fact discovery be extended for at least 90 days from December 16, 2020 until March 16, 2021.

RESPECTFULLY SUBMITTED this 20th day of December 2020.

By: \_\_\_\_\_ /s/  
Caitlin Shortell #0405027

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
Heather Gardner #0111079

**CERTIFICATE OF SERVICE**

This certifies that on this 20th day of December 2020, a copy of the foregoing document was served via CM/ECF, to which the following parties' counsel are subscribers.

Rebecca Cain  
State of Alaska, Office of the Attorney General  
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Rebecca Hattan  
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Attorney for Defendants

/s/ Caitlin Shortell